

**From:** [Barbara Nann](#)  
**To:** [Benjamin Lammie](#); [Amy Legare](#); [Carl Bolden](#); [Barbara Aldridge](#); [Garyg Miller](#)  
**Subject:** Fw: Gulfco--Revised AOC Provisions Chart  
**Date:** 01/23/2008 11:29 AM  
**Attachments:** [Document.pdf](#)

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Just got this from the PRPs

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----- Forwarded by Barbara Nann/R6/USEPA/US on 01/23/2008 11:29 AM -----

**Elizabeth.Webb@tklaw.com**

01/23/2008 11:13 AM

To Barbara Nann/R6/USEPA/US@EPA  
cc Garyg Miller/R6/USEPA/US@EPA,  
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Subject Gulfco--Revised AOC Provisions Chart

Barbara, as discussed on our call last Friday, I have revised the table of AOC provisions to summarize the steps we discussed to transition the Gulfco site activities from the current amended UAO to non-time critical removal actions conducted under an AOC. The attached table lists the types of recitals and ordering provisions we discussed to accomplish the goals of construction complete and acres ready for reuse at the site. This table lists only the potential recitals and ordering provisions for the transition process and implementing the future site response activities. My thought is that the other typical AOC provisions will be based upon the Revised Model Administrative Settlement Agreement and Order on Consent for Removal Actions, (2007). We can discuss any adjustments to the Model language necessary for this approach after developing the site specific provisions. For example, we will want to modify the Model language to provide that the contractor approvals granted and submittals approved under the earlier UAOs are incorporated by reference into the AOC and need not be approved or submitted again.

We are also happy to assist in any way we can with the initial drafting of any of the AOC provisions if you desire such assistance.

We look forward to continuing our discussion with you on Friday, February 1.

If you have any questions concerning the attached table, please call.

(AOC Provisions)

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Counsel

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